

NICHOLAS A. TRUTANICH  
United States Attorney  
District of Nevada  
Nevada Bar Number 13644  
KIMBERLY M. FRAYN  
Assistant United States Attorney  
501 Las Vegas Blvd. South, Suite 1100  
Las Vegas, Nevada 89101  
Phone: (702) 388-6336 / Fax: (702) 388-6418  
kimberly.frayn@usdoj.gov  
*Representing the United States of America*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

MIGUEL ANTONIO MURILLO-RAMOS,

Defendant.

Case No.: 2:17-cr-00375-JAD-NJK

**Stipulation to Continue Supervised Release  
Revocation Hearing**  
(Third Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defendant and Kathryn C. Newman, Assistant Federal Public Defender, counsel for MIGUEL ANTONIO MURILLO-RAMOS, ("Murillo"), that the supervised release revocation hearing in the abovementioned case, which is currently scheduled for March 1, 2020 at 2:00 p.m., be continued and reset to a date and time convenient to this Court, but not sooner than two weeks from the current setting for the following reasons:

1. On or about October 13, 2020, Murillo appeared on the petition seeking to revoke his supervised release. The Court continued the revocation hearing to February 22, 2021, in

1 order that the parties could resolve case number 2:200cr-114-JCM-NJK prior to taking up the  
2 revocation matter. ECF 53. On February 12, 2021, Murrillo pleaded guilty to a new violation of  
3 8 U.S.C. § 1326, and was sentenced to 46 months in custody, followed by a 3-year term of  
4 supervision in case number 2:200cr-114-JCM-NJK, ECF 31.

5 2. On February 16, 2021, the Court rescheduled the revocation hearing to March 1,  
6 2021 at 2:00 pm, ECF 54.

7 3. Government counsel has a scheduling conflict for the March 1 hearing date. The  
8 parties have agreed to continue the supervised release revocation hearing to a date and time  
9 convenient to this Court, but not sooner than two weeks from the current setting, so that the  
10 government can have continuity of counsel.

11 4. The defendant is incarcerated but does not object to the continuance.

12 5. The parties agree to the continuance.

13 6. The additional time requested herein is not sought for purposes of delay, but  
14 merely to allow the parties sufficient time within which adequately prepare for the revocation  
15 hearing. Additionally, denial of this request for continuance could result in a miscarriage of  
16 justice, and the ends of justice served by granting this request, outweigh the best interest of the  
17 public and the defendant in a speedy hearing.

18 ...  
19  
20  
21  
22  
23  
24

7. This is the third stipulation to continue the hearing.

DATED this 26th day of February, 2021.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
United States Attorney

/s/ Kathryn C. Newman  
KATHRYN C. NEWMAN  
Assistant Federal Public Defender

/s/ Kimberly Frayn  
KIMBERLY FRAYN  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3  
4 UNITED STATES OF AMERICA,

5  
6 Plaintiff,

7  
8 v.

9 MIGUEL ANTONIO MURILLO-RAMOS,

10 Defendant.  
11

Case No. 2:17-CR-00375-JAD-NJK

**Findings Of Fact, Conclusions Of Law  
And Order**

12  
13 **FINDINGS OF FACT**

14 Based on the pending Stipulation of counsel, and good cause appearing therefore, the  
15 Court finds that: 1. On or about October 13, 2020, Murillo appeared on the petition seeking to  
16 revoke his supervised release. The Court continued the revocation hearing to February 22, 2021,  
17 in order that the parties could resolve case number 2:200cr-114-JCM-NJK prior to taking up the  
18 revocation matter. ECF 53. On February 12, 2021, Murrillo pleaded guilty to a new violation of  
19 8 U.S.C. § 1326, and was sentenced to 46 months in custody, followed by a 3-year term of  
20 supervision in case number 2:200cr-114-JCM-NJK, ECF 31.

21 2. On February 16, 2021, the Court rescheduled the revocation hearing to March 1,  
22 2021 at 2:00 pm, ECF 54.

23 3. Government counsel has a scheduling conflict for the March 1 hearing date. The  
24 parties have agreed to continue the supervised release revocation hearing to a date and time

1 convenient to this Court, but not sooner than two weeks from the current setting, so that the  
2 government can have continuity of counsel.

3 4. The defendant is incarcerated but does not object to the continuance.

4 5. The parties agree to the continuance.

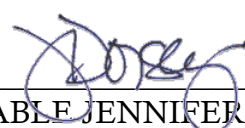
5 6. The additional time requested herein is not sought for purposes of delay, but  
6 merely to allow the parties sufficient time within which adequately prepare for the revocation  
7 hearing. Additionally, denial of this request for continuance could result in a miscarriage of  
8 justice, and the ends of justice served by granting this request, outweigh the best interest of the  
9 public and the defendant in a speedy hearing.

10 7. This is the third stipulation to continue the hearing.

11 **ORDER**

12 THEREFORE, IT IS HEREBY ORDERED that the revocation hearing in the above-  
13 captioned matters, currently scheduled for March 1, 2021, be vacated and continued to March  
14 29, 2021, at 2:00 p.m.

15  
16 DATED this 28th day of February, 2021

17  
18   
19 HONORABLE JENNIFER A. DORSEY  
20 United States District Judge  
21  
22  
23  
24